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*DOLLAR TREE STORES, INC.*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

LISA TRAYLOR,  
  
Plaintiff,  
  
vs.  
  
DOLLAR TREE STORES, INC.,  
  
Defendant(s).

CASE NO.: 2:23-cv-01246-ART-VCF  
  
**STIPULATION AND ORDER TO  
EXTEND DISCOVERY  
DEADLINES**  
  
**(First Request)**

IT IS HEREBY STIPULATED by and between Plaintiff LISA TRAYLOR, by and through her counsel of record, MUSLUSKY LAW, and Defendant DOLLAR TREE STORES, INC., by and through its counsel of record, the law firm of HALL & EVANS, LLC, that discovery in this matter shall be extended for sixty (60) days.

**I. REASON FOR REQUESTED CONTINUANCE**

The parties request this extension due to Plaintiff's disclosure of an additional 134 pages of medical records in her first supplemental disclosure on December 26, 2023, during the holiday season. During such time, experts traditionally take time off and request extensions to prepare

reports. The combination of the aforementioned has placed a burden on Defendant's expert to prepare such reports.

The parties assure this Court that with an accommodation, they will continue to work together to diligently move this case along.

## **II. DISCOVERY COMPLETED TO DATE**

1. All parties have exchanged F.R.C.P. 26(f) Disclosures of Witnesses and Exhibits and supplements thereto; and
2. Plaintiff has propounded one set of Requests for Production of Documents, one set of Requests for Admissions, and two sets of Interrogatories and received responses.
3. Defendants have propounded one set of Requests for Production of Documents, Requests for Admissions, and Interrogatories and received responses.

## **III. DISCOVERY TO BE COMPLETED**

1. Initial expert disclosures
2. Rebuttal expert disclosures
3. Additional medical records collection, as necessary
4. Potential IME
5. Depositions of treating medical providers and expert witnesses
6. Depositions of Dollar Tree associates

## **IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

Based on the foregoing, the parties agree that good cause exists to extend the discovery deadlines as follows:

	Current Deadlines	Proposed Deadlines
Close of Discovery	3/18/2024	<b>May 17, 2024</b>

Initial Expert Disclosures	1/18/2024	<b>March 18, 2024</b>
Rebuttal Expert Disclosures	2/16/2024	<b>April 16, 2024</b>
Dispositive Motions	4/17/2024	<b>June 16, 2024</b>

### V. CURRENT TRIAL DATE

The parties request that the trial date be continued in accordance with the proposed deadlines set forth above.

DATED this 8<sup>th</sup> day of January, 2024.

#### MUSLUSKY LAW

*/s/ Adam L. Muslusky, Esq.*

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DATED this 8<sup>th</sup> day of January, 2024.

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*Attorneys for Defendant Dollar Tree Stores, Inc.*

### ORDER

IT IS SO ORDERED this 11th day of January, 2024.

UNITED STATES MAGISTRATE JUDGE